

# NASHVILLE VANGUARD LAW, PLLC

404 James Robertson Pkwy  
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John H. Morris, Esq.

Application granted. Sentencing  
adjourned to May 11, 2021 at  
2:00 p.m.

Ph. (615) 229-5529

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4 January 2021

SO ORDERED:

## VIA ECF

The Honorable William H. Pauley III  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street, New York, NY 10007

  
WILLIAM H. PAULEY III  
U.S.D.J.

January 6, 2021



Re: United States v. Jason Ward  
20 Cr 272 (WHP)

Dear Judge Pauley:

I write with the consent and agreement of the Government to postpone Mr. Ward's sentencing hearing, currently scheduled for Wednesday, January 13, 2021, to a date convenient to the Court and the Government in March 2021. Counsel respectfully informs this Court that he is currently unavailable on the following dates due to local court trial commitments:

- March 1-16, 2021
- March 22-26, 2021

That said, our courts in Tennessee remain in a state of constant flux due to the COVID crisis and those dates could change if the situation does not improve. Counsel is also currently scheduled for involvement in a trial in the Middle District of Tennessee Federal Court on April 1, 2021 that is contemplated to last up to three months. While counsel will not be required for the duration of the trial, he does not know at this time when during the April – June 2021 he would be available.

The defense waives speedy trial time until the date the Court sets for this hearing. This is the second request for an adjournment. In support, counsel for Mr. Ward submits that the COVID situation has worsened since his last request for an adjournment. That request was due to travel restrictions and quarantine rules in place in New York for travelers coming from restricted states,

of which Tennessee is one, which made this hearing a practical impossibility to conduct in person. As stated, that situation has now become more sever.

Mr. Ward and his counsel believe that an in-person hearing is in his best interests and wish to appear before the Court to present his case and submit to the justice of the Court. At the date and time set by this Court, Mr. Ward expects to present his case for mitigation and be sentenced by this honorable Court.

Respectfully,

/s/ John H. Morris  
**JOHN H. MORRIS**  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 4<sup>th</sup> day of January 202a, a true and correct copy of the foregoing letter motion has filed with the Court ECF system and has been sent via email to:

Jacob R. Fiddelman  
Assistant United States Attorney  
United States Attorney's Office  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007  
Tel: 212-637-1024  
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/s/ John H. Morris  
**JOHN H. MORRIS**